

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
Steven P. Teti	:	
	:	
Debtor	:	BANKRUPTCY NO. 18-13276 JKf

M&T BANK		:
	Movant	:
STEVEN P. TETI		:
and WILLIAM C. MILLER		:
	Respondents	:

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF OF BANK OF NEW YORK,
TRUSTEE**

Debtor, by and through Joseph F. Claffy, Esquire, his attorney, contests the Motion for Relief sought by M & T BANK, and in support thereof avers the following:

1. Admitted.
2. Admitted.
3. Denied. Debtor has no knowledge of whether or not movant is in fact the mortgage holder and therefore must deny same demanding strict proof.
4. Admitted.
5. Admitted.
6. Admitted in part; denied in part. Admitted that payments have not been made. Denied that payments are due considering that the plan of this bankruptcy is a sale plan. The bank has consistently failed to accept or review proposed agreements of sale, thus delaying the sale process.
7. Denied. Creditor had no basis for the motion and therefore is not entitled to legal fees.
8. Denied.
9. Denied. After investigation debtor believes that the alleged calculated amount is incorrect and denies it demanding strict proof.
10. Denied as a conclusion of law and ultimate fact.

11. Denied as a request for future hypothetical relief which may or may not be appropriate at a future time.

WHEREFORE, respondent debtor requests that the court deny the motion.

Respectfully submitted:

/s/ Joseph F. Claffy
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